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November 24, 2023

Mary Kopaskie-Brown, Historic Preservation Officer
Development Services, City of Mesa
55 N Center St
Mesa, AZ 85201

Re: Review of draft document *Historic Preservation Design Guidelines for Mesa's Historic Resources*

Dear Ms. Kopaskie-Brown:

Thank you for the opportunity to comment on the draft document, *Historic Preservation Design Guidelines for Mesa's Historic Resources*, provided to our office on October 25, 2023. SHPO staff has reviewed the document and has provided detailed comment as a markup to the pdf, which is transmitted with this letter. Below, please find our general comments on the document.

1. In general, the document contains numerous grammatical errors and typos. A close reread is suggested to reconcile these mistakes. The document should also receive a copyedit to ensure that the voice employed and the formatted presentation of data is consistent.
2. The document also contains factual errors and inconsistencies throughout. We have attempted to identify errors in construction dates, historical information, architectural style descriptions, district maps, and current property photographs, but we may not have identified all instances.
3. The Historic District maps presented in the document do not convey the important distinction between contributing and non-contributing properties within the districts. The current legend information with "properties in the historic district" does not allow users of the document to identify the National Register status of any one particular building. The Temple Historic District map, in particular, incorrectly includes properties that have been demolished. Please modify to include information on contributing and noncontributing status and also consider use of a map inset to convey the approximate location of the subject district within the City.
4. There is a notable absence of historic context in this document. While a complete developmental history of Mesa is not necessary, some historical information is crucial in order for the user to understand the "why" of Mesa's historic preservation program (i.e. what are the significant historical themes of the City's development and what types of properties reflect them?)
5. The document does not provide information regarding character defining features of landscaping within districts as well as guidance for making alterations to landscaping. In particular, provisions for low water use or sustainable plant selection are very much needed given the reality of sustained drought conditions in Arizona.
6. The descriptions of the individual historic districts do not include any information about the district's historical development or notable district-wide character defining features. Without identifying the

unifying character defining features of properties within a district, it is impossible for a user to understand what particular features should be preserved.

7. Definitions or explanations of “Historic Landmark” and “Mesa Historic Property Register” do not include the important caveat that these properties contain a legal zoning overlay.
8. As referenced in the *City of Mesa Historic Preservation Design Guidelines Frequently Asked Questions*, the reasons for why the Mid-Century Modern architectural style is not included in the document is because “the style is not common within any of the designated historic districts” in Mesa. SHPO wishes to remind the HPO that both the Fraser Fields and Flying Acres historic districts contain multiple Mid-Century Modern buildings, as do many Register-eligible (but not yet designated) neighborhoods within Mesa. Although this document is intended for use in evaluating appropriate modifications for currently designated resources, the guidelines should also be sufficiently forward-looking to accommodate reasonably anticipated designations. To wit, page 4-19 of the *Mesa 2040 General Plan* specifically mentions the abundance of post-war subdivisions that are eligible for designation, many of which contain Mid-Century Modern styles.
9. We note that this document focuses exclusively on residential building types, to the exclusion of institutional, civic, and commercial architecture. This comes despite Mesa possessing one of the most intact historic commercial Main Streets in the metro Phoenix area and an abundance of architecturally significant Mid-Century Modern commercial, civic and religious properties throughout the City. Although only one commercial building is listed in the Mesa Historic Property Register, it is critical to include design guidelines for this property type.
10. This document provides an excess of information about existing wall/fence materials and style, but no mention of height limits or the addition of fencing located on the primary façade of buildings within designated historic districts. There is little instance in Mesa where modifying an existing wall or fence would be cause for delisting a property, but the inappropriate construction of walls and fencing in historic districts could cause a contributing property to become noncontributing, and as such should be addressed in the Design Guidelines.
11. Nowhere in the document is it recommended that professionals qualified and experienced in historic buildings rehabilitation be retained for substantial work on historic properties. For major remodels and additions to buildings, the Guidelines should recommend that consultation and/or oversight by designers, architects, engineers and landscape architects in order to ensure the character-defining features and integrity of historic properties is preserved.

SHPO appreciates the opportunity to review and comment on the proposed design guidelines document, which we believe is a critical resource for ensuring the successful preservation of historic properties identified by the City as worthy of preservation. If you have any questions regarding our review, please feel free to contact me directly at 602-542-4009 or by email at KLeonard@azstateparks.gov.

Sincerely,



Kathryn Leonard
State Historic Preservation Officer

cc:

Dr. Nana Appiah, Development Services Director; Rachel Nettles, Assistant Planning Director
Kellie Rorex, Senior Planner; Maura Jackson, Historic Preservation Specialist